

FILED IN CHAMBERS  
U.S.D.C. Atlanta

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

MAY 04 2010

JAMES N. HATTEN, Clerk

By: *L. Wade Childs*  
Deputy Clerk

UNITED STATES OF AMERICA

CRIMINAL ACTION

v.

NO. 1:10-CR-

BRADLEY LOREN KAM,  
MATTHEW EVERETT GOULD,  
ADRIAN OCTAVIO MENDOZA,  
a/k/a ANGEL, and  
TRUNG Q. LE

1:10-CR-194

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning on a date unknown to the Grand Jury, but at least as of 2005, and continuing until at least on or about December 6, 2009, in the Northern District of Georgia and elsewhere, the defendants, BRADLEY LOREN KAM; MATTHEW EVERETT GOULD; ADRIAN OCTAVIO MENDOZA, aka "ANGEL;" and TRUNG Q. LE knowingly combined, conspired, confederated, agreed, and had a tacit understanding with each other and with other persons known and unknown to the Grand Jury, to violate Title 21, United States Code Section 841(a)(1), that is, to possess with the intent to distribute a controlled substance, that is, marijuana, a Schedule I controlled substance, said conspiracy involving at least 1,000 kilograms of a mixture and substance containing a detectable amount of marijuana, in violation

of Title 21, United States Code, Sections 841(a)(1), 841 (b)(1)(A)(vii), and 846, and Title 18, United States Code, Section 2.

FORFEITURE PROVISION

1. As a result of committing the controlled substance offenses alleged in this Indictment, defendants, BRADLEY LOREN KAM; MATTHEW EVERETT GOULD; ADRIAN OCTAVIO MENDOZA, aka "ANGEL;" and TRUNG Q. LE shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a), any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of a violation alleged in this Indictment.

2. If, as a result of any act or omission of the defendants, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

A True BILL

[Signature]  
FOREPERSON

SALLY QUILLIAN YATES  
UNITED STATES ATTORNEY

[Signature]  
JENNY R. DURNER  
ASSISTANT U.S. ATTORNEY  
Georgia Bar No. 719439  
600 U.S. Courthouse  
75 Spring St., S.W.  
Atlanta, GA 30303  
404/581-6084 (voice)  
404/581-6171 (facsimile)